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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

KANDACE BATTLE and RACHEL
CHRISTINA GOODWIN, individually, and on
behalf of all others similarly situated and the
State of California under the Private Attorneys
General Act,

Plaintiff,

v.

CALIFORNIA CLINIC MANAGEMENT, LLC;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2023-00039498-CU-OE-CTL

PAGA REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Lauren G.
Freestone, Dept. C-64]*

**DECLARATION OF RACHEL
GOODWIN IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

Approval Hearing Date:

Date: May 9, 2025
Time: 10:30 a.m.
Dept.: C-64

Complaint filed: September 12, 2023
FAC filed: April 11, 2025
Trial date: Not Set

DECLARATION OF RACHEL GOODWIN

I, Rachel Goodwin, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am a named Plaintiff in this action filed pursuant to the Private Attorneys General Act (“PAGA”) and submit this declaration in support of Plaintiff’s Motion to Approve PAGA Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$10,000.00 service payment for my role as the PAGA Representative.

3. I am a former employee of Defendant California Clinic Management, LLC (“Defendant”). I worked for Defendant from approximately June 2019 to approximately February 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant’s policies and practices that have been alleged as unlawful in the complaint.

4. I initially filed a similar lawsuit against Defendant in Riverside in 2022 because I was concerned that I was not paid properly for all the hours that I worked, I was not provided all of my meal and rest breaks, and I was not reimbursed for all business expenses. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks. Furthermore, my co-workers and I were not reimbursed for all of our business expenses.

5. By representing other aggrieved employees in this lawsuit, I hoped that I might be able to change Defendant’s policies to better protect the working conditions of my co-workers. I also understood it was my duty as the PAGA Representative to represent the State of California and other aggrieved employees, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing my case, I provided Wilshire Law Firm with a detailed account of the facts related to my employment with Defendant. Additionally, I provided my counsel with documentation in the form of pay statements that applied to my employment with Defendant.

Based on my conversations, my attorneys and I were able to identify instances when I was not paid correctly.

7. I have invested a lot of personal time and energy while this lawsuit has been pending. I made it a priority to be actively involved because I wanted to do everything I can to assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and their staff to discuss updates on the case and to provide my attorneys with additional information.

8. I spent multiple hours looking for documents that my attorneys asked me to provide to help this case.

9. I also made myself available during the mediation for this case and I kept in regular contact my attorneys before and after the mediation to ensure that any questions the attorneys had could be answered.

10. I also reviewed documents filed in this case, including the settlement-related documents.

11. I believe the settlement is a good settlement and I would recommend that the Court approve it because I believe that this settlement is fair, adequate, and reasonable in view of PAGA's purposes. I am glad that I had the opportunity to represent the aggrieved employees in this lawsuit and that I was able to recover penalties through a settlement for the aggrieved employees and the State of California. I have also observed my attorneys' work throughout this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

12. I estimate that I spent **at least 70 hours on my case and this case** since I first contacted Wilshire Law Firm in 2022.

13. I did not make the decision to file a representative action lightly. I was concerned by the attention a lawsuit, and especially a representative action, would attract. My name would be associated with a lawsuit that I filed against my former employer and I am mindful that future employers might find out that I sued a former employer, which could hurt my employability. In a competitive job market, this factor may weigh heavily against me.

14. Standing up for myself and the rights of others was not an easy decision, and I am relieved that this case is coming to an end.

1 15. I respectfully request that the Court award me a \$10,000 service payment. I am
2 receiving no additional compensation other than the compensation provided for in the settlement.
3 However, I understand that this settlement involved a general release for the other plaintiff and
4 me, which covers claims that do not apply to other aggrieved employees. Based on my
5 involvement in this case and the benefits provided to workers of Defendant, I can say I helped
6 represent the other workers who may have been too afraid to say anything to management because
7 they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid
8 to take that risk because I strongly care about helping my fellow co-workers.

9 16. Although I continue to fear that employers may find out that I participated in this
10 lawsuit and hold it against me, I felt that important rights were at stake that hurt myself and other
11 employees.

12 I declare under penalty of perjury, under the laws of the State of California and the United
13 States of America, that the foregoing is true and correct.

14 Executed on April 17, 2025 at Queen Creek, Arizona.

DocuSigned by:

Rachel Goodwin

Rachel Goodwin